

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
NORTHERN DISTRICT OF ALABAMA, WESTERN DIVISION**

**MINNIE ROBERTSON POWELL**

**DEBTOR.**

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**CASE NO. 15-71830**

**MOTION TO SURRENDER**

Come now the Debtor, by and through undersigned counsel of record, and move this Honorable Court to allow surrender of the Debtor's remaining interest in collateral, specifically, a Kirby Cleaning System ("Collateral") to creditor United Consumer Financial Services ("Creditor").

Wherefore, Debtor prays this Honorable Court to allow the surrender of debtor's remaining interest in the subject collateral and further grant relief to allow Creditor to execute and liquidate Collateral, with any later filed deficiency balance to be paid as an unsecured claim.

Respectfully submitted this date: March 15, 2016.

/s/ Kathryn L. Bettis

Kathryn L. Bettis, Attorney for Debtor(s)

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**CERTIFICATE OF SERVICE**

I certify that on this date March 15, 2016 I served a copy of the foregoing on each of the creditors and parties listed above by US Mail with proper postage, and on the Chapter 13 Trustee by electronic mail and/or via ECF noticing, and on the following Creditor and Co-Debtor by US Mail:

United Consumer Financial Services  
c/o Bass and Associates, P.C.  
3936 E Ft. Lowell Suite 200  
Tucson, AZ 85712

/s/ Kathryn L. Bettis

Of Counsel